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JULY 19 1971



July 19, 1971

Mr. Walter A. Lyon, Director
Division of Sanitary Engineering
Bureau of Environmental Health
Pennsylvania Department of Health
Harrisburg, Pennsylvania 17120

Dear Walter:

Re: Whitmoyer Laboratories, Inc.

I am back at work after a somewhat disjointed vacation. I would certainly value an opportunity to sit down with John Carson and other concerned persons to discuss informally some problems of mutual interest, so I hope that you can arrange such a meeting. I will be in Europe during the last week of July and perhaps the first week of August. Otherwise, I should be available.

While you were away we had our meeting to review the situation at Whitmoyer. Tom Iezzi, Bill Ambrogi, Franz Dengler and myself met with Dick Boardman, Don Lazarchik and Carlyl Westlund. As part of our assessment of where we stand as a result of our recovery operations of the last five years and the effect of the cessation of these efforts on March 16, 1971, we reviewed the attached data on the levels of arsenic in the outlying wells, springs and monitoring wells and the creek.

It was agreed that EPA's absolute ban on discharge of arsenical wastes to the Atlantic ocean even at distances of at least 115 miles from shore had cut the ground out from under the basic assumption on which our recovery and discharge program had been undertaken. It was also agreed that EPA's publicity suggesting that arsenic in sea water may be a more serious problem than mercury had done nothing to alleviate the public concern over the presence of arsenic in streams and other water resources. If this EPA suggestion were a fact, I should think all marine life would have perished long since.

Both Dick Boardman and Don Lazarchik said that they could not conscientiously recommend a resumption of the recovery operation even

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though they felt that there was a possibility that a permit to discharge would be approved by the Corps of Engineers on the basis of certification by your department.

Tom Iezzi reported that a fairly substantial effort to overstress the area had not produced any substantial change. The inference to be drawn from his report and an analysis of the well and stream data appears to be that we have reached the point of diminishing returns in our recovery efforts and that an asymptotic situation has been reached as far as recovery is concerned.

The upshot of our discussion was that we agreed that we would not resume the recovery operation for at least one year, that we would continue to monitor the stream, the wells and the springs that have been monitored in the past, and will keep your office posted on the results of all monitoring and, finally, in the absence of any untoward development, we will not formally review this situation again until approximately one year has elapsed. In other words, we agreed that an interval of approximately a year would be sufficient to enable us to judge whether any further effort should be made beyond the very considerable effort already made to reduce the level of arsenic in the area beneath the plant.

We all recognize that the problem of accurately assessing the effect of the presence of arsenic in the ground water and particularly in the stream bottom may arise in connection with the construction and utilization of the Blue Marsh Dam. My personal hunch is that the arsenical material will not prove a real problem; but if the Corps or anyone else is disposed to make a substantial issue of it, we can anticipate that we may have to do a considerable amount of work to provide a basis for a definitive judgment (if one is possible) on the long term effect. I don't believe we can do anything constructive beyond what we have done to reduce still further the possibility of a substantial adverse effect.

Very truly yours,


F. J. Rarig
Secretary

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FJR:CBW
Attachments

PRIVATE WELLS

<u>No.</u>	<u>Name</u>	<u>1968</u>	<u>1969</u>	<u>1970</u>	<u>1971</u>	<u>*After shut down</u>
R-3	Wartluft	0.41	1.61	0.39	0.45	0.52
R-4	Kreider	0.21	0.19	0.09	0.07	0.07
R-5	Halderman	0.14	0.15	0.11	0.17	0.15
R-6	Gibble	0.51	0.24	0.11	0.12	0.14
R-7-A	Moore	0.03	0.02	0.01	not sampled	0.03
R-8	Donmoyer	9.56	9.89	5.11	4.63	3.40
R-13	Weaver	0.05	0.04	0.01	0.02	0.00
R-14	Brown	0.03	0.00	0.02	vacant	vacant
R-93	Mays	0.03	0.03	0.03	0.02	0.02
R-95	Diem	0.06	0.03	0.03	0.02	0.02
R-130	Swanger	1.38	1.37	1.37	1.20	1.44
R-133	Wenger	0.13	0.07	0.07	0.05	0.10
R-135	Smith	0.82	0.20	0.20	0.24	0.32
R-136	Hibshman	0.23	0.23	0.23	0.14	0.05
R-137	Loose	0.18	0.04	0.04	0.22	0.06
1W1C	Miller Machine	0.39	0.09	0.05	0.04	0.02
1W-2	Beyler	0.06	0.05	0.03	0.02	0.02

*Sampled 5/24/71

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Rt 422

Rt 422

100196

I-WIC

Whitney
Plant Site

R7-A2

R-4

R-3

R-8

R-135

R-133

R-136

R-132

R-137

I-W-2

R-43

R-95

R-13

R-1

R-6

R-5

Rt 501

Rt 501

Reading
Railroad

TULPEHOCKEN
CREEK

N

Private Wells

Whitney Plant Site

VI. WELL CONCENTRATIONS MONTHLY

1970									1971		
<u>April</u>	<u>May</u>	<u>June</u>	<u>July</u>	<u>Aug.</u>	<u>Sept.</u>	<u>Oct.</u>	<u>Nov.</u>	<u>Dec.</u>	<u>Jan.</u>	<u>Feb.</u>	<u>March</u>
125	105	124	84	108	142	119	91	100	98	93	108
67	35	41	29	32	57	51	48	35	25	29	223
13	18	245	145	100	127	83	30	19	13	17	10
74	83	135	68	93	191	187	63	58	42	53	45
77	66	94	62	59	104	89	82	64	33	59	79
112	88	76	44	66	92	84	164	189	154	196	158
257	296	316	152	276	426	397	477	357	452	459	414
28	15	23	13	16	20	24	36	16	21	21	19
8	10	9	5	12	5	3	2	4	6	5	6
12	11	33	16	133	65	64	34	17	15	12	7
35	28	43	19	28	44	43	33	46	27	28	24
4	2	2	2	2	6	5	7	9	9	6	5
14	15	17	10	17	21	17	22	20	19	14	16
6	6	6	4	4	18	37	18	10	12	14	6
59	56	83	47	59	94	85	79	68	66	72	66

All figures are expressed in p.p.m. as Total Arsenic.

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